

MODULE IV – RCRA CORRECTIVE ACTION PROGRAM

IV.A. CORRECTIVE ACTION PROGRAM (CAP)

- IV.A.1 The Permittee shall conduct a CAP for each solid waste management unit (SWMU) listed in Table 1, each inactive Area of Concern (AOC) listed in Table 2 and for newly identified SWMUs as described in Condition IV.G. The purpose and objectives of the CAP are described in Appendices A and B. The CAP has three main parts, including: 1) the RCRA Facility Investigation (RFI), 2) the Corrective Measures Study (CMS) and Corrective Measures Implementation (CMI), and 3) Long-term site tracking, inspection and monitoring. The Conditions in Module IV are based on the requirements of the Utah Code Ann. 19-6-105 (1)(d), R315-8-6.11 and R315-101 of the Rules
- IV.A.2 The Permittee shall implement a community relation's plan as outlined in Appendix A during the CAP.
- IV.A.3. The Executive Secretary may append additional SWMUs or AOCs to those listed in Tables 1 and 2 as described in Condition IV.G.
- IV.A.4. The Permittee shall use its best effort to secure all funds that may be required for implementation of the CAP. Failure to obtain adequate funds for the CAP may be considered cause for modification of any approved schedules or compliance dates.
- IV.A.5. If necessary, the Permittee shall seek, by the most expeditious means possible, appropriations from the U.S. Congress for funding to complete the CAP, in accordance with Sections 1-4 and 1-5 of Executive Order 12088 as implemented by the Office of Management and Budget Circular A-106, as amended. Section 1-5 of Executive Order 12088 states "The head of each executive agency shall ensure that sufficient funds for compliance with applicable pollution control standards are requested in the Agency budget."
- IV.A.6. Immediately upon failure to obtain adequate funding, the Permittee shall submit to the Executive Secretary for approval a written request and justification, for modification of the approved schedule(s) in Tables 3 and 4. The written justification shall demonstrate that good cause exists, and document efforts to obtain adequate funding. The Permittee shall also provide an alternate schedule of compliance for continuing the CAP or parts of the CAP for the subsequent fiscal year.
- IV.A.7. Failure to obtain adequate funds or appropriations from Congress shall not in any way release the Permittee from its obligation to conduct a CAP.
- IV.A.8. If adequate funds for the CAP are not available, the Executive Secretary reserves the right to pursue any actions deemed necessary to protect human health and the environment, including but not limited to administrative proceedings, judicial action, or termination of this permit.

IV.B. STANDARD CONDITIONS

- IV.B.1. Failure to submit the information required by Module IV or falsification of any submitted information is grounds for enforcement action.

- IV.B.2. The Permittee shall sign and certify all plans, reports, notifications, and other submissions to the Executive Secretary in accordance with Conditions I.BB and I.DD.
- IV.B.3. The Permittee shall submit a minimum of three copies of each plan, report, notification, or other submissions described in Module IV, to the Executive Secretary. One of the three copies shall be submitted in electronic format.
- IV.B.4. Upon written approval by the Executive Secretary, all final plans, schedules and reports required by the conditions in Module IV, are incorporated by reference into Module IV. Any noncompliance with such approved plans and schedules shall be deemed noncompliance with this permit and may be subject to enforcement action. Final RFI reports and final CMS workplans shall be incorporated into this permit as outlined in Condition IV.C and R315-3-4.3 of the Rules. Incorporation of RFI reports into the permit constitutes a Class II permit modification.
- IV.B.5. The Permittee shall submit all draft final plans and reports, final plans and reports, and schedules as specified in Tables 3 and 4. The Permittee shall revise draft final plans, reports and schedules described in Module IV in the time frames specified in Tables 3 and 4 or as specified otherwise by the Executive Secretary. The Permittee may request extensions to these schedules for approval by the Executive Secretary.
- IV.B.6. The Permittee shall notify the Executive Secretary ten days before any sampling or other activities specified in the plans and reports described in Module IV and Appendices A and B.
- IV.B.7. All raw data, such as sample results, laboratory reports, drilling logs, bench-scale or pilot-scale data, survey data, and other supporting information gathered or generated during activities undertaken pursuant to Conditions in Module IV shall be maintained at the Facility during the effective term of this permit, unless the Executive Secretary approves an alternate timeframe upon request of the Permittee. Executing contractors may store data for Dugway that is retrievable within seven days during contract life. The Permittee shall provide copies of the said reports, logs, and other data and information to the Executive Secretary upon request.
- IV.C. RCRA FACILITY INVESTIGATION (RFI)**
- IV.C.1. The Permittee shall conduct the RFI for all SWMUs and inactive AOCs listed in Tables 1 and 2, as described in Appendix A.
- IV.C.2. The Permittee shall notify the Executive Secretary in writing within thirty days of making a determination that an AOC as listed in Table 2 is inactive. This notification shall include a schedule for conducting an RFI as described in Condition IV.C.1 and Appendix A.
- IV.C.3. The Permittee shall prepare and submit the results of the RFI in the draft final Phase II RFI Reports and CMS Workplans for the SWMUs and AOCs as described in Tables 3 and 4 and as described in Appendices A and B. Based on the RFI results, the Phase II RFI Reports shall propose risk-based residential land use, industrial land use or remedial action as defined in R315-101 of the Rules. The final Phase II RFI Report and CMS Workplans shall be added to the permit as described in Condition IV.B.4. which requires a sixty-day public comment period.

- IV.C.4. The Permittee shall annually provide an updated schedule for submittal of Phase II RFI Reports and CMS Workplans as needed for AOCs and SWMUs for approval by the Executive Secretary by September 30 of each year.
- IV.C.5. For SWMUs meeting the industrial risk requirements of R315-101 of the Rules, but where corrective action or a CMS is not needed or is no longer needed due to implementation of interim measures as described in Condition IV.E., the Permittee shall include post-closure or other long-term site management requirements in the Phase II RFI Reports. Upon final approval by the Executive Secretary of the Phase II RFI Reports, the Permittee shall implement the post-closure or other long term site management requirements until such time as the SWMU(s) is added to a post-closure permit or an alternate long-term site management plan is approved by the Executive Secretary.
- IV.C.6 The Permittee shall prepare and submit for Executive Secretary approval, a Facility-wide ecological assessment plan as indicated in Table 3 and Appendix A. This plan may include all active or inactive AOCs, Hazardous Waste Management Units (HWMU) or SWMUs listed in Tables 1 and 2.
- IV.C.7 The Permittee shall prepare and submit for Executive Secretary approval, a plan addressing potential hazards related to historical testing of biological agents at SWMUs and AOCs. This plan shall be submitted as indicated in Table 3.

IV.D DETERMINATION OF NO FURTHER ACTIONS (NFA)

- IV.D.1. The Permittee may propose for approval by the Executive Secretary in the final Phase II RFI Report, final Phase I RFI Report for AOCs, (or for Interim Measures/Voluntary Action or SWMU Assessment Reports as described in Condition IV.G) that SWMUs listed in Table 1 or AOCs listed in Table 2 be excluded from further investigation in accordance with R315-3-4.3 of the Rules for Class II permit modifications. An NFA designation generally means that land use is completely unrestricted, long-term site management is not required and that the requirements of this permit are no longer applicable
- IV.D.2. An NFA proposal shall contain information gathered during the RFI demonstrating that no releases of hazardous waste or hazardous waste constituent(s) are present, or that releases which may be present have been adequately defined and meet the NFA criteria specified in R315-101 of the Rules and Appendix A.
- IV.D.3. A determination of NFA shall not preclude the Executive Secretary from requiring further investigations, studies, or remediation at a later date if new information or subsequent analysis indicates a release or potential of a release from any SWMU, AOC or newly identified site as described in Condition IV.G.

IV.E. CORRECTIVE MEASURES STUDY (CMS) AND IMPLEMENTATION

- IV.E.1. Based on the data and conclusions presented in RFI Reports and CMS Workplans described in Condition IV.C, the Permittee shall submit draft final CMS Reports describing site remediation or site management alternatives and plans for SWMUs which do not qualify for NFA or industrial use without corrective action as described in Condition IV.D, R315-101 of the Rules and Appendix A. The proposed alternatives and plans shall meet the requirements of Appendix B, Table 4, R315-101 of the Rules or other requirements specified in approved Phase II RFI Reports, CMS Workplans, EPA guidance documents, guidance from the Executive Secretary regarding landfills and groundwater management plans.
- IV.E.2. Upon the Executive Secretary's approval of the final CMS Report for each SWMUs or each group of SWMUs, the Permittee shall submit to the Executive Secretary for approval, a draft final Corrective Measures Implementation (CMI) Plan. The requirements for the draft final CMI plan are specified in Appendix B and Table 4, and shall include a CMI implementation schedule and post-closure requirements.
- IV.E.3. Upon the Executive Secretary's approval of the final CMI Plan, the Permittee shall implement the CMI plan as specified in the final CMI schedule and Table 4.
- IV.E.4. The Permittee shall prepare and submit a draft final CMI report, for approval by the Executive Secretary according to the schedule specified in the final CMI plan and Table 4. This report shall include independent verification that the remedial action was properly constructed and the CMI Plan was properly executed and implemented.
- IV.E.5. Immediately upon completing implementation of the CMI plan, the Permittee shall begin post-closure inspection and monitoring activities as specified in the final CMI plan. The post-closure monitoring requirements in the final CMI plan shall be added to a post-closure permit or other long-term monitoring plan as specified in the CMI Report.

IV.F. INTERIM MEASURES

- IV.F.1. At any time during the CAP, if the Executive Secretary or the Permittee determines that a release or potential release of hazardous waste and/or hazardous waste constituent(s) from an AOC or SWMU or other situation poses a potential threat to human health and the environment, the Executive Secretary may require the Permittee to perform interim measures or the Permittee may voluntarily propose interim measures.
- IV.F.2. In determining whether an interim measure(s) is required, the Executive Secretary (or the Permittee in the case of a voluntary interim measure) shall consider the following:
- IV.F.2.a. The time required to develop and implement a final remedy;
 - IV.F.2.b. The actual and potential exposure of human and environmental receptors;
 - IV.F.2.c. The actual and potential contamination of drinking water supplies and sensitive ecosystems;
 - IV.F.2.d. The potential for further degradation of the medium absent of interim measures;
 - IV.F.2.e. The presence of hazardous waste in containers that may pose a threat of release;

- IV.F.2.f The presence and concentration of hazardous waste including hazardous waste constituent(s) in soils having the potential to migrate to groundwater or surface water.
 - IV.F.2.g The weather conditions that may affect the current levels of contamination;
 - IV.F.2.h The risks of fire, explosion, or accident; and
 - IV.F.2.i Other situations that may pose threats to human health and the environment.
- IV.3 If the Executive Secretary or Permittee determines the need for an interim measure(s), or voluntary interim measures as described in Condition IV.F.2. the Permittee shall submit for approval by the Executive Secretary an Interim Measures Plan.
- IV.F.4. The Interim Measures Plan or a Voluntary Interim Measures Plan shall identify specific action(s) to be taken to implement the interim measures and a schedule for implementing the required measures. The Interim Measures Plan or the Voluntary Interim Measures Plan shall be incorporated into this permit upon approval of the plan by the Executive Secretary. The Interim Measures Plan or a Voluntary Interim Measures Plan shall include, but not be limited to the following:
- IV.F.4.a. The objectives of the interim measures, including how the measure is mitigating a potential threat to human health and the environment and is consistent with R315-101 of the Rules;
 - IV.F.4.b. The data collection quality assurance and data management information;
 - IV.F.4.c. The design plans and specifications, construction or excavation requirements, operation and maintenance requirements, project schedules, and final design documents;
 - IV.F.4.d. The construction quality assurance objectives, inspection activities, sampling requirements, and documentation; and
 - IV.F.4.e. The schedule for submittal of progress reports, the interim measures workplan, the final design documents, the draft final interim measures report, and the final interim measures report.

IV.G. NEWLY IDENTIFIED AOCs OR SWMUs

- IV.G.1. The Permittee shall notify the Executive Secretary in writing within 30 days of discovery of any newly identified sites, which the Permittee believes may meet the definition of an AOC, HWMU or SWMU. Upon notification, the Executive Secretary and the Permittee shall schedule a visit to the site(s). During the site visit the Permittee shall present available information about the site as needed to justify a decision about how to manage the site. These decisions include: 1) a determination that the site is not an AOC, HWMU or SWMU; 2) a determination that the site will be addressed through the process outlined in Condition IV.F for interim measures (if managed under Condition IV.F, the site does not need to be added to Table 1); or 3) a determination that a newly identified AOC or SWMU needs to be added to Table 1 and that the Permittee must include the new AOC or SWMU in the RFI program as described in Appendix A.

- IV.G.2. If information is presented during the decision making process described in Condition IV.G.1 to indicate that hazardous wastes were or may have been placed in a newly identified SWMU after November 19, 1980, the Executive Secretary may consider the unit as a Hazardous Waste Management Unit (HWMU/non-notifier) and require the Permittee to close the unit under the requirements of R315-7 and R315-101 of the Rules.
- IV.G.3. Within 30 days of making a decision and choosing a site management process as described in Condition IV.G.1, the Permittee shall submit a schedule for submittal of an interim measures plan or RFI Workplan.
- IV.G.4. The RFI Workplan or interim measures plan shall, at a minimum, include the following information: description of past and present operations and dates of operation; description of site waste streams; all existing site environmental monitoring data; a sample and analysis plan; a quality assurance and quality control plan; plans for collection of human health and ecological risk assessment data and other data and information as needed to fulfill the requirements of R315-101 of the Rules. The plan shall also include a schedule for plan implementation and a date for submittal of a draft final report of results.
- IV.G.5. The Permittee shall submit draft final and final Interim Measures or RFI Reports describing all results obtained from the implementation of the approved plans. The reports shall also include a risk assessment and a CMS Workplan as needed for approval by the Executive Secretary.
- IV.G.6. Based on the results and conclusions proposed by the Permittee in the Final Interim Measures or RFI Report, the Executive Secretary may approve the site for no further action as defined in Condition IV.D, require further investigations or require a CMS as described in Condition IV.E.

IV.H. REPORTING REQUIREMENTS

- IV.H.1. The Permittee shall submit to the Executive Secretary written quarterly progress reports of all activities conducted pursuant to the Conditions of Module IV. The progress reports may be in the form of letter reports or minutes from programmatic update meetings.
- IV.H.2. Quarterly progress reports shall contain a summary description of the work completed during the previous quarter, work projected for the next quarter, and summaries of waste management problems or deviations from approved workplans encountered during the reporting period and actions taken or to be taken to rectify problems, description of any newly identified SWMUs and other information as listed in Appendix A.
- IV.H.3. The Executive Secretary may require the Permittee to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other information.

¹ Table 1 - Solid Waste Management Units (SWMUs) U.S. Army Dugway Proving Ground (Dugway)		
SWMU Number	²HWMU	³SWMU Name, General Location and Status
1		Landfill, V-Grid, Combined with SWMU 3
2	X	Landfill, Granite Mountain, Certified Closure (4)
3		Decontamination Bldg. T9410, V-Grid, includes SWMUs 1 and 5 RFI Complete (4)
4		Old Baker Lab, Granite Mountain
5		Combined with SWMU 3, V-Grid
6		Petroleum Storage Area, V-Grid, RFI Complete (4)
7	X	Silo Brine Tanks, Granite Mountain, Certified Closure (4)
8		Waste Pile and Burial Site, Granite Mountain
9 & 9A	X	Waste Pile 3X Scrap, Granite Mountain
10		Landfill, Granite Mountain, RFI Complete (4)
11		Low Level Radiation Landfill, Granite Mountain
12		Landfill, Granite Mountain, RFI Complete (4)
13		Decontamination Pad, Downwind Grid, RFI Complete (4)
14	X	Ordnance Disposal Site, Downwind Grid
15		Landfill, Rising Sun Area
16		Decontamination Pad, Downwind Grid RFI Complete
17		Agent Disposal Sites (landfills). Tower Grid RFI Complete (4)
18		Waste Pile, Tower Grid RFI Complete (4)
19		Waste Pile, Tower Grid RFI Complete (4)
20	X	Landfill, Camels Back Ridge, Certified Closure (4)
21		Landfill, Camelback Ridge, RFI Complete (4)
22		RFI Complete (4)
23		Waste Burial Site, SW Tower Grid, RFI Complete (4)
24		Landfill, November Road, RFI Complete (4)
25		Disposal Area, Jct., Downwind Grid, RFI Complete (4)
26		Landfill, Highway 101, RFI Complete (4)
27		PCB/POL Storage Site, (Bldgs 9450/9452)
28		Waste Pile, Horizontal Grid, RFI Complete (4)
29		Waste Pile, Horizontal Grid, RFI Complete (4)
30	X	Landfill, Wig Mountain, Certified Closure (4)
31		Waste Burial Site, North Wig Mountain
32		Waste Pile, SW of Baker Laboratory
33	X	Sewage Lagoon, Baker Laboratory, Certified Closure (4)
34	X	Boiler House Impoundment, Baker Laboratory, Certified Closure (4)
35		Drainfield, North of Baker Laboratory
36	X	Imhoff Tank/Drainfield, Ditto, Certified Closed(4)
37	X	Landfill West of Ditto Tech Ctr (Incls SWMU 87, 89)
38	X	Decontamination Pad, Ditto, Certified Closure (4)
39	X	Landfill, North of Avery
40	X	Containers/Storage Area, Avery, Certified Closure (4)
41		Evaporation Pond and Radiation Testing, Avery
42	X	Contractor Landfill. English Village. Certified Closure (4)

43	X	Old Landfill, English Village, Certified Closure (4)	
44		Old Sewage Treatment Plant, English Village (Includes SWMU 68)	
45	X	French Drain, English Village Certified Closed (4)	
46	X	Sump & Vehicle Maint. Shop, English Village, Certified Closure (4)	
47	X	Sewage Lagoons, Fries Park, Certified Closure (4)	
48	X	Containers/Storage Area/F999 and PCBs, Fries Park, Certified Closure (4)	
49		Quonset Hut & PCB Storage, Fries Park, Not DERA Funded	
50		Landfill, Camel Back Ridge, RFI Complete (4)	
51	X	Evaporation Ponds, Near Ditto Tech Ctr (DTC)	
52		Waste Burial Sites, Carr RFI Complete (4)	
53		Landfill, Carr, RFI Complete (4)	
54		Landfill/Disposal Area(s), East of Carr (4) RFI Complete	
55	X	Landfill/3X Disposal Site, East of Carr	
56&56B		Waste Pile/Landfill/Storage Site, East of Carr, RFI Complete for SWMU 56	
57		Landfill, Southeast Facility Boundary, RFI Complete (4)	
58	X	Evaporation Pond, Carr	
59	X	Waste Pile and 3X/F999 Storage, Carr, Certified Closure (4)	
60		Containers/Chemical Storage Area, Carr, RFI Complete	
61		Landfill and Contaminated Soil, Carr	
62		Three Munitions Igloos, Carr, RFI Complete (4)	
63-1&2	X	Septic Tanks, Carr, Certified Closure (4)	
64		Landfill, Tower Grid, RFI Complete (4)	
65		Detonation Crater, White Sage, RFI Complete (4)	
66		Landfill, Hill 5900, RFI Complete (4)	
67		RFI Complete (4), Investigated as Formerly Used Defense Site (FUDS)	
68		Combined with SWMU 44	
69		Petroleum Storage Area, English Village, Not DERA Funded	
70		Landfill, English Village, RFI Complete (4)	
75		Old Sewage Lagoon, Fries Park, RFI Complete	
76		Disturbed Ground, Little Granite, RFI Complete (4)	
77		Waste pile/Ex-asphalt Pile, Little Granite Mountain, RFI Complete (4)	
79		Landfills, Old Lincoln Highway (Includes SWMUs 57, 80, and 106)	
80		Waste Pile, Little Granite, RFI Complete (4)	
81		Former Munitions Storage, Little Granite, RFI Complete (4)	
82		Waste Pile, Michaels Airfield, RFI Complete (4)	
87		Landfill, Ditto, Included with HWMU 37, RFI Complete (4)	
89		Landfill, Ditto, Included with HWMU 37, RFI Complete (4)	
90	X	Burning Area/Landfill, Carr	
91		Waste Pile, Baker, RFI Complete (4)	
92		Landfill, Baker, RFI Complete (4)	
93		Landfill, German Village, RFI Complete (4)	

96		Waste Pile, Michaels Airfield, RFI Complete (4)	
97		Drain Field & Decontamination Pad, SW of Avery	
98		Pipeline Excavation, Old Igloos, Carr	
99	X	Landfill/3X/F999 Storage, Camelback Mountain, Certified Closure (4)	
101		Waste Pile, East Wig Grid, RFI Complete (4)	
103		Decontamination Pad, Granite Mountain, RFI Complete (4)	
104		Decontamination Pad, Victory Road, RFI Complete (4)	
105		Landfill/Decontamination Pad, Carr (Combined with SWMU 180)	
106		Landfill, Carr, RFI Complete (4)	
107		Decontamination Pad, Tower Grid, RFI Complete (4)	
108		Landfill, Granite, RFI Complete (4)	
109		Landfill, Granite, RFI Complete (4)	
110		Landfill, Granite, RFI Complete (4)	
111		Landfill, Granite, RFI Complete (4)	
113		Landfill, Carr, RFI Complete (4)	
114		Old GPI-3 Test Site, V-Grid (Includes SWMU 202)	
115		Landfill, X-Ray Road, RFI Complete (4)	
116		Landfill, Nye Road, RFI Complete (4)	
117		Landfill, Falconer Road, RFI Complete (4)	
118		Concrete Test Vat, East of V-Grid RFI Complete (4)	
120		Incinerator, English Village, RFI Complete (4)	
121		Incinerator, Baker, RFI Complete (4)	
122		Incinerator, Baker, RFI Complete (4)	
123		Incinerator, Baker, RFI Complete (4)	
124	X	Incinerator, Baker/Carr, Certified Closure (4)	
125		Sump, Avery, RFI Complete (4)	
126		Yellow Jacket, RFI Complete (4), Investigated as a FUDS	
127		Southern Triangle, RFI Complete (4), Investigated as a FUDS	
128	X	Pesticide Building Drainfield, English Village, Certified Closure (4)	
130	X	Gas Station Drainfield, English Village, Certified Closure (4)	
131-132		90-day areas, RFI Complete (4)	
133		HWHA-3 (Aircraft Maint. Shop Wastes), Ditto	
134-145		90-day areas, RFI Complete (4)	
150		Waste Lines, Bldg 3445	
151		Building 3445, Carr, RFI Complete (4)	
152		Building 3445, Carr, RFI Complete (4)	
153		Building 3445, Carr, RFI Complete (4)	
154		Waste Lines, DTC	
155		Tanks and Sumps, DTC, RFI Complete (4)	
156		Tanks and Sumps, DTC, RFI Complete (4)	
157		Tanks and Sumps, DTC, RFI Complete (4)	
158	X	Evaporation Pond, North of Michael AAF, Certified Closure (4)	

159		Incinerator, English Village, RFI Complete (4)	
160	X	Landfill, Wig Mountain, Certified Closure (4)	
161	X	Landfill North of Baker, Certified Closure (4)	
162	X	Decontamination Pad, North of Avery, Certified Closure (4)	
163	X	Fire Training Area, Avery Certified Closure (4)	
164	X	Wash Rack #1, Avery, Certified Closure (4)	
165	X	Wash Rack # 2, Avery, Certified Closure (4)	
166	X	Wash Rack #3, Avery, Certified Closure (4)	
167	X	Wash Platform, Ditto, Certified Closure (4)	
168	X	Vehicle Wash Rack, Carr Certified Closure (4)	
169	X	Wash Rack, Baker, Certified Closure (4)	
170	X	Steam Cleaning, English Village, Certified Closure (4)	
171		BZ Test Area, Building 2006, Baker, RFI Complete (4)	
172		Cadmium Battery Area, Avery, RFI Complete (4)	
173		Lead-acid Battery Shop, Ditto Tech Ctr	
174		Mixed Waste Storage, Baker, RFI Complete (4)	
175		Neutralization Tank, Avery, RFI Complete (4)	
176		Acid Dilution Sump, RFI Complete (4)	
177		Dry Cleaning Area, Bldg. 4229 Ditto	
178		Photo Laboratory, Bldg. 4258 Ditto, RFI Complete (4)	
179		4-Sumps/Underground Tanks, Bldg. 3342 & 3048 Carr, RFI Complete (4)	
180		Old Bio Laboratory, West of Carr	
181		X-Ray Laboratory, Bldg. 3131 Carr, RFI Complete (4)	
182		Detonation Test Box, Camel Back, RFI Complete (4)	
183		B-29 Aircraft, West of Granite Peak.	
184		Air Filter System, Avery, RFI Complete (4) (Combined with SWMU 41)	
185		Old Chemical Lab, Bldgs 4165 and 4153, Ditto, RFI Complete (4)	
186		RFI Complete (4)	
187		RFI Complete (4)	
188		Waste Pit, North of Rising Sun Grid, RFI Complete (4)	
189		Waste Pit, North of Rising Sun, RFI Complete (4)	
190	X	Ranger Landfill and Used Oil Site, North of Baker, Certified Closure (4)	
191		RFI Complete (4)	
192		Landfill, 63 Pits, West of Granite Peak	
193		Decontamination- Pad, West of Granite Peak, RFI Complete (4)	
194 ABC		Landfills, East of Carr, RFI Complete (4)	
195		RFI Complete (4)	
196		RFI Complete (4)	
197		Landfill, Old Target Site, Downwind Grid	
199		Old OB/OD East of SWMU 17, Tower Grid, RFI Complete (4)	
200		Landfill, SE of Carr RFI Complete	
201		Contaminated Cave. Camels Back	

202		(Now known as SWMU 114)	
203		Removed From Investigation	
204		Lewisite Area, Simpson Buttes	
205		Grassy Plots Surface Disposal, East of Baker, RFI Complete (4)	
206		Surface Disposal Area, NW of Michael AAF	
207		Disposal Trenches and Mounds, Carr, RFI Complete	
208		Drum Burial Site, SE of Carr	
209		Biological Test Plots, Baker	
210		Glass Disposal Site, South of Baker	
211		Coral Pit Landfill, North of Camels Back Ridge	
212		M55 Rocket Test Site, South of Tower Grid RFI Complete (4)	
213		Burial Trench, Target S, RFI Complete (4)	
214		Decontamination Pad, Target S RFI Complete (4)	
215		Pigeon Loft Trenches, Downwind Grid, RFI Complete (4)	
216		Trash Pit, NW of Granite Peak RFI Complete (4)	
<ol style="list-style-type: none"> 1. The basis for listing of each SWMU can be found in the RCRA Facility Assessment (RFA) dated March 20, 1992, as amended in November 1996 to include SWMUs 186-216. 2. Hazardous Waste Management Units (HWMUs) are closed according to the requirements of R315-7-14, R315-101 and Consent Order 8908994. HWMUs are not subject to the corrective action requirements of this permit except as described in Conditions IV.A.2, IV.B, IV.F, IV.G and Appendix A, items 4 and 5. 3. The location coordinates for each SWMU are provided in Appendix C of Module IV. 4. RFI Complete means that the Phase I and II RFI Reports for this site have been approved by the Executive Secretary and are incorporated into this permit by this reference. The approved RFI reports recommend risk based residential or industrial use or corrective action and a CMS. Certified Closed means that the site has met the closure requirements listed in item 2 above. 			

TABLE 2
***AREAS OF CONCERN (AOC)**

AOC NUMBER	NAME AND LOCATION
1	Test Range 1 - Romeo, Juliet, Ballistic
3	Test Range 3 - Granite Peak Impact Area
4	Test Range 4 - All Purpose Grid Facility
5	Test Range 5 - CBR Target Area
6	Test Area 6 - Chemical Corps Board Area
7	Test Area 7 - North Wig Grid
8	Test Area 8 - V Grid
9	Test Area 9 - Target X Area
10	Test Area 12 - Wig Mountain Impact Area
11	Test Area 13 - White Sage Flats
12	Test Area 14 - West Granite Peak Firing Range
13	Test Area 15 - Tower Grid Area
14	Test Area 16 - Hill 5700
15	Test Area 17
16	Test Area 18 - Mortar Range
17	Test Areas 20, 21, 23, 24, Biological Test Areas
18	Test Area 25 - Slit Trenches/North Lincoln Hwy.
19	Test Area 26 - Salt Flats Grid/Granite Peak
20	Test Area 27 - Anthrax Test Site/Granite Peak
21	Carr Facility, Area around Carr Facility.

*The basis for listing of each AOC in this table is contained in the document titled *RCRA Facility Assessment (RFA) for U.S. Army Dugway Proving Ground, 1994*.

TABLE 3 RCRA FACILITY INVESTIGATION COMPLIANCE SCHEDULE FOR SOLID WASTE MANAGEMENT UNITS (SWMUS) AND AREAS OF CONCERN (AOC)	
RFI Activity	Due Date
Submit Final Phase I RFI Report	The Phase I RFI for the SWMUs listed in Table 1 is complete and has been approved.
Submit Final RFI-Phase II Workplans and Implement the Workplans	The Executive Secretary has approved the Phase II RFI Workplan for all sites, and all Phase II RFI workplans have been implemented. Minor data gaps are filled by submittal of variances and amendments to the approved workplan. The variances and amendments must be approved by the Executive Secretary.
Submit Draft Final Phase II RFI Reports and CMS Workplans for each site or group of sites (grouping of sites is determined by the Permittee).	As specified in the Executive Secretary approved RFI-Phase II Workplan and Schedule. The Permittee shall annually provide an updated schedule. This schedule shall be submitted annually by September 30 for Executive Secretary approval.
Progress Reports	Quarterly (every 90 calendar days) beginning 90 calendar days after permit renewal as described in Condition IV.H.
Submit a Schedule for submittal of a Site-Wide Ecological Assessment for Executive Secretary approval	Within 90days of permit reissuance
Submit a Schedule for submittal of plan addressing potential biological agent contamination for Executive Secretary approval	Within 180days of permit reissuance

TABLE 4 CORRECTIVE MEASURES STUDY (CMS) AND IMPLEMENTATION COMPLIANCE SCHEDULE FOR SOLID WASTE MANAGEMENT UNITS (SWMUS) AND AREAS OF CONCERN (AOC)	
CMS SUBMISSION/CMI SUBMISSION	Due Date
Submit CMS Workplans	CMS Workplans shall be incorporated into Phase II RFI Reports
Submit Draft Final CMS Report	As specified in the Executive Secretary's approved schedule to be included in Final CMS Workplans
Submit Final CMS Report	As specified in the Draft Final CMS Report
Submit Draft Final Corrective Measures Implementation (CMI) Plan	As specified in the approved Final CMS Report
Submit Final CMI Plan	As specified in the Draft Final CMI Plan
Implement CMI Plan	As specified in the Final CMI Plan
Submit Draft Final CMI Report	As specified in the Final CMI Plan
Submit Final CMI Report	As specified in the Draft Final CMI Report
Conduct approved Post-Closure Activities and Implement any approved post-closure plans	As specified in the Final CMI Plan and Condition IV.E.5